

<010>	Study Area Code	518005
<015>	Study Area Name	Union Telephone Company
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Slamowitz
<035>	Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fccclaw.com

<142> State WY

Fremont

<143> County _____

Wind River Indian Reservation

<144> Tribal Land(s) on which ETC Serves _____

Tribal Engagement Narrative .pdf

<145> Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes, No, Not Applicable) for each of these boxes to confirm the status described on the attached PDF, on line 145, demonstrates coordination with the Tribal government pursuant to § 54.1004 includes:

<146> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;

<147> Feasibility and sustainability planning;

<148> Marketing services in a culturally sensitive manner;

<149> Compliance with Rights of way processes

<150> Compliance with Land Use permitting requirements

<151> Compliance with Facilities Siting rules

<152> Compliance with Environmental Review processes

<153> Compliance with Cultural Preservation review processes

<154> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, Not Applicable)
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

<010>	Study Area Code	518005
<015>	Study Area Name	Union Telephone Company
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Slamowitz
<035>	Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fcclaw.com

<200> Date Authorized to Receive Support
<201> Targeted Completion Date
<202> Total Mobility Fund Support Awarded
<203> Total Mobility Fund Support Disbursed

07/29/2013

07/30/2016

2479218

826406

<210> Actual Completion Date
<211> Project Status Description (attached)

518005_ FremontWY-4_PSD.pdf

(Name of PDF attached)

Please check these boxes below to confirm that the attached PDF, on line 211, contains a project status pursuant to §54.1005(b)(2)(v). The information shall be submitted as appropriate.

<212> Status of Network Deployment - Network Design
<213> Status of Network Deployment - Construction
<214> Status of Network Deployment - Deployment
<215> Status of Network Deployment - Maintenance
<216> Project Budget Status
<217> Project Plan Status

✓
✓
✓
✓
✓
✓

<218> Network will Support 3G/4G Mobile Service ?

☐ 3G☒ 4G

(101) Certification - Reporting Carrier		FCC Form 690 Approved by OMB OMB Control No. 3060-1185 Page 7 of 8
--	--	---

<010>	Study Area Code	518005
<015>	Study Area Name	Union Telephone Company
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Slamowitz
<035>	Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fcclaw.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for Mobility Fund Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the reporting requirements for Mobility Fund recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	CERTIFIED ONLINE Date 07/01/2016
Printed name of Authorized Officer: Chris Reno	
Title or position of Authorized Officer: Director of Accounting	
Telephone number of Authorized Officer: 3077826131 ext.	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<010>	Study Area Code	518005
<015>	Study Area Name	Union Telephone Company
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Slamowitz
<035>	Contact Telephone Number - Number of person identified in data line <030>	7035848678 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tslamowitz@fccclaw.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File for Mobility Fund Recipients on Behalf of Reporting Carrier

I certify that (Name of Agent) Lukas, Nace, Gutierrez & Sachs, LLP is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.

Name of Authorized Agent: Lukas, Nace, Gutierrez & Sachs, LLPName of Reporting Carrier: Union Telephone Company

Signature of Authorized Officer:

Date:

Printed name of Authorized Officer:

Title or position of Authorized Officer:

Telephone number of Authorized Officer:

Study Area Code of Reporting Carrier: 518005Filing Due Date for this form: 07/01/2016

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File for Mobility Fund Recipients on Behalf of Reporting Carrier

I, as agent for the reporting carrier, certify that I am authorized to submit the reports for Mobility Fund recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.

Name of Reporting Carrier: Union Telephone CompanyName of Authorized Agent Firm: Lukas, Nace, Gutierrez & Sachs, LLP

Signature of Authorized Agent or Employee of Agent:

Date: 06/30/2016Name of Authorized Agent Employee: Todd SlamowitzTitle or position of Authorized Agent or Employee of Agent: FCC Legal CounselTelephone number of Authorized Agent or Employee of Agent: 7035848678 ext.Study Area Code of Reporting Carrier: 518005Filing Due Date for this form: 07/01/2016

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Attachments

<141>

Percentage of
Total Population
Reached by
Service

4

9

FCC Form 690

Mobility Fund Phase 1 – § 54.1009 Annual Reporting

Line 041: Description of documents filed with Form 481

The documents filed with FCC Form 481 in its Annual Report include:

- Unfulfilled Service Requests (voice), if any.
- Service Quality Standards & Consumer Protection Rules Compliance.
- Functionality in Emergency Situations.
- Tribal Government Engagement Obligation.
- Voice Services Rate Comparability Certification.

FCC FORM 690

(060) COVERAGE AND PERFORMANCE REPORT

Union Telephone Company ("Union") did not complete any drive tests or related coverage files in submission format with respect to the SAC associated with this filing during the reportable period. Union is currently undergoing drive testing and intends on submitting the data and related coverage files in conjunction with its Payment Request 3 Form 690 for this SAC.



Study Area Code: 518005
Study Area Name: Fremont, WY
Program Year: 2016
Contact Person: Chris Reno
Contact Telephone Number: 307-782-6131
Contact Email: creno@unionwireless.com
Carrier Reference Name: Fremont WY-4

PROJECT STATUS DESCRIPTION

SECTION I: DESCRIPTION OF OVERALL PROJECT PLAN

- 3G RNC/MSC/GGSN/SGSN PLUS 4G EPC

In order to launch this system, the necessary 3G and 4G core network needed to be completed and turned operational. This system totals roughly \$3.4 million in network core equipment, which will be shared across all 6 census tracts granted funding to Union Telephone Company in the FCC 901 Mobility Fund.

The core is located in Cheyenne, Wyoming and is fed via dual OC12 networks, giving full redundancy and capacity to support all tower sites related to this project and other network growth on the Union Wireless network. Additional OC12s are already planned as demand increases and also to provide carrier diversity in case of an outage on one particular carriers' network.

STATUS – This portion of the project is complete. Please refer to Section II for more details on the status of the network deployment.

- MIDDLE MILE BACKHAUL

In addition, Union is upgrading its middle mile capabilities in key sections of Wyoming that will allow adequate backhaul facilities to its new 3G and 4G network core.

The first of these upgrades is located in Carbon County, WY between the towns of Hanna and Saratoga. This project connects two new service providers and allow connectivity into several key remote offices within Union Telephone Company's network.

STATUS – This portion of the project is complete. Please refer to Section II for more details on the status of the network deployment.

The second middle mile upgrade was determined to be necessary after 3G/4G deployments in and around the FCC Mobility Fund Phase I deployments starting becoming accessible to consumers. The steep uptake in data services required further upgrades from Rawlins north to the towns of Casper and Riverton to maintain the long-term data speed requirements across all six census tracts as required by fund.



Study Area Code: 518005
Study Area Name: Fremont, WY
Program Year: 2016
Contact Person: Chris Reno
Contact Telephone Number: 307-782-6131
Contact Email: creno@unionwireless.com
Carrier Reference Name: Fremont WY-4

STATUS – This portion of the project is under construction. Please refer to Section II for more details on the status of the network deployment.

- FREMONT WY-4 (T56013000400) 3G HSPA+

This project consists of two overlays on existing facilities, and two new builds one of which has an existing tower and the other is on private lands. The entire service area in this census tract is on the Wind River Indian Reservation.

TYPE OF BACKHAUL – Union Telephone Company is utilizing leased services when available. We are also using licensed microwave wherever necessary and unlicensed microwave if no available licenses are capable of being obtained. We are targeting at least 25 Mbps of IP backhaul to each cell tower.

SPECTRUM – In this market, we are utilizing spectrum currently licensed to Union Telephone Company. Licensed frequencies in the cellular, PCS, AWS and 700 MHz bands will be used as necessary to maintain the network requirements provided in the scope of this project.

KEY RISKS OR CHALLENGES - This cluster has the unique challenge in that the eligible miles are on the Wind River Indian Reservation. This presents a unique challenge in that the commercial company does not have to negotiate with only one tribe, but rather two, given the joint management of the Reservation by the Northern Arapaho and Eastern Shoshone tribes. Given the nature of the region and the expected demand on broadband services for the area, and to ensure enough time to make adequate leasing arrangements, Union Wireless has determined that 4G speeds for this region would be beneficial to the Tribal Members and businesses. This will initially be accomplished using HSPA+ technologies with the option to upgrade, but at the same time Union Wireless is also deploying some LTE technologies, which could also be utilized. This will also afford more time for the Band 12 device interoperability issue to be properly resolved by the FCC and other carriers.

STATUS – This portion of the project is constructed and in drive test with the exception of one site still requiring final leasing approval from the Wyoming Department of Transportation before construction can start. Please refer to Section II for more details on the status of the network deployment.

LASTED	✓
MILESTONE IN PROGRESS:	✓
MILESTONE MET:	✓
DESIGN START:	✓
DATE AUTHORIZED TO RECEIVE SUPPORT:	✓

[illegible]



Study Area Code: 518005
Study Area Name: Fremont, WY
Program Year: 2016
Contact Person: Chris Reno
Contact Telephone Number: 307-782-6131
Contact Email: creno@unionwireless.com
Carrier Reference Name: Fremont WY-4

PROJECT STATUS DESCRIPTION

SECTION III: PROJECT BUDGET STATUS

Overlay Sites

- 2 each
 - New hardware Required
 - New Node B Base Station gear \$60,000 each
 - New Microwave gear for IP Backhaul \$150,000 each
 - Upgrades to tower antenna complex \$20,000 each
 - Labor to related projects \$70,000 each

Each overlay site estimated at \$300,000 cost each, total \$600,000 capital contribution

New Sites

- 2 each
 - New hardware Required
 - Tower installation
 - Leasing, zoning, permitting costs \$65,000 each
 - Tower site construction \$75,000 each
 - Tower Steel \$45,000 each
 - Lines, antennas, generators \$50,000 each
 - New Node B Base Station gear \$60,000 each
 - New Microwave gear for IP Backhaul \$50,000 each
 - Upgrades to tower antenna complex \$5,000 each
 - Labor to related projects \$50,000 each

Each overlay site estimated at \$200,000 cost each, for a \$400,000 total capital contribution for new sites.
This totals roughly \$1.2 million in capital costs related to the build out.

Union is projecting incremental operating expenses for this site over 5 years to be \$1.56 million.



Study Area Code: 518005
Study Area Name: Fremont, WY
Program Year: 2016
Contact Person: Chris Reno
Contact Telephone Number: 307-782-6131
Contact Email: creno@unionwireless.com
Carrier Reference Name: Fremont WY-4

BUDGET STATUS –

Core Network and Middle Mile Backhaul Upgrades:	\$1,246,843.42
Fremont WY-4 3G HSPA+:	\$756,136.25
Total Support Applied to Design/Construction/Deployment:	\$2,002,979.67 – OVER BUDGET
<hr/>	
Total Support Applied to Maintenance:	\$0 – ON BUDGET

TRIBAL ENGAGEMENT NARRATIVE

In accordance with 47 CFR 54.1009 (a)(5) & 54.1004, Union Telephone Company d/b/a Union Wireless ("Union Wireless" or "Company") has engaged and is continuing to engage with representatives of the Northern Arapaho Tribe and the Eastern Shoshone Tribe in order to provide services to the Tribal land network.

I. Introduction

Union Wireless has contracted the services of EnerTribe, Inc., a 100% native owned company that specializes in tribal government, specifically regarding communications projects.

Union Wireless's goal is to provide service to rural areas within Wyoming, including tribal lands and work with tribes to ensure positive collaboration. During the past year, Union wireless has accomplished this by working cooperatively with EnerTribe, local tribal governments as well as tribal enterprise. The tribal Governments include the Northern Arapaho Business Council (NABC), Wind River Internet (WRI), Northern Arapaho Tribal Industries (NATI), Eastern Shoshone Business council (ESBC) and many departments within the government. Additionally, Union has worked with the Bureau of Indian Affairs (BIA) and their department heads since the BIA is the trustee of the land on the reservation. EnerTribe has been used as a means to develop interdepartmental and governmental relations between the tribes and Union. This has been accomplished by means of monthly and bi-monthly onsite visits, Business Council meetings, regular conference calls and a cohesive strategy to develop joint communications projects with both tribes.

While there are only two tribes located on the reservation, there have actually been three tribal governments involved in each project; NABC, ESBC and the Joint Business Council (JBC) which at one point, represented the interests of both tribes.

Below is the list of the projects and workflow being used with both the tribes and associated enterprises and government agencies.

Projects

1. Crowheart Fire Station – New Tower Build (**COMPLETED**)
 - a. *Presentations and status updates to business councils*
 - i. *Meeting dates: 9/21/15, 10/26/15, 1/3/16-1/5/16, 2/3/16*
 - ii. *Please see cover letters for proposals to each tribe (Appendix A) - subsequent meetings discussed those proposals working toward a resolution.*
 - b. *Tribal Historic Preservation Office (THPO) review for both tribes*
 - c. *IT Review for both tribes*
 - d. *Tribal Employment Rights Office (TERO) Review for both tribes*
 - e. *Bureau of Indian Affairs (BIA) consideration (In progress)*
 - f. *SHPO review*
 - g. *Tribal legal review*
 - h. *Counsel review*
2. Winkleman – Collocation on existing WYDOT tower (**COMPLETED**)
 - a. *Presentations to business councils*
 - i. *Meeting dates: 9/21/15, 10/26/15, 1/3/16-1/5/16, 2/3/16*
 - ii. *Please see cover letters for proposals to each tribe (Appendix A) - subsequent meetings discussed those proposals working toward a resolution.*

- b. Tribal Historic Preservation Office (THPO) review for both tribes
 - c. IT Review for both tribes
 - d. Tribal Employment Rights Office (TERO) Review for both tribes
 - e. Bureau of Indian Affairs (BIA) consideration (In progress)
 - f. SHPO review
 - g. Tribal legal review
 - h. Council review

- 3. Ethete – New tower build (free standing to allow for 2 years to permit permanent site) **(COMPLETED)**
 - a. Tribal Historic Preservation Office (THPO) review for both tribes
 - b. Presentations to business councils
 - i. Meeting dates: 9/21/15, 10/26/15, 1/3/16-1/5/16, 2/3/16
 - ii. Please see cover letters for proposals to each tribe (Appendix A) - subsequent meetings discussed those proposals working toward a resolution.
 - c. IT Review for both tribes
 - d. Tribal Employment Rights Office (TERO) Review for both tribes
 - e. Bureau of Indian Affairs (BIA) consideration (In progress)
 - f. SHPO review
 - g. Tribal legal review
 - h. Council review

- 4. Rocky Mountain Hall – Collocation on an Existing Building **(IN PROGRESS)**
 - a. Presentations to business councils
 - i. Meeting date: 4/12/16
 - ii. Please see cover letters for proposals to the Eastern Shoshone Tribe (Appendix B)
 - b. Tribal Historic Preservation Office (THPO) review for both tribes
 - c. IT Review for both tribes
 - d. Tribal Employment Rights Office (TERO) Review for both tribes
 - e. Bureau of Indian Affairs (BIA) consideration
 - f. SHPO review
 - g. Tribal legal review
 - h. Council review

- 5. Arapaho Water Tank – Collocation on existing Free-Standing Water Tower **(IN PROGRESS)**
 - a. Presentations to business councils
 - i. Meeting date: 4/12/16
 - ii. Please see cover letters for proposals to the Northern Arapaho tribe (Appendix C)
 - b. Tribal Historic Preservation Office (THPO) review for both tribes
 - c. IT Review for both tribes
 - d. Tribal Employment Rights Office (TERO) Review for both tribes
 - e. Bureau of Indian Affairs (BIA) consideration
 - f. SHPO review
 - g. Tribal legal review
 - h. Council review

- 6. Fiber Project – 3 Ethete Road (Frank Wise Building) to Fort Washakie **(IN PROGRESS)**

- a. *Presentations to business councils*
 - i. *Meeting date: 4/12/16*
 - ii. *Please see cover letters for proposals to the Eastern Shoshone Tribe (Appendix B)*
 - b. *Tribal Historic Preservation Office (THPO) review for both tribes*
 - c. *IT Review for both tribes*
 - d. *Tribal Employment Rights Office (TERO) Review for both tribes*
 - e. *Bureau of Indian Affairs (BIA) consideration*
 - f. *SHPO review*
 - g. *Tribal legal review*
 - h. *Council review*
7. **Fiber Project – Arapaho to Hudson (IN PROGRESS)**
- a. *Presentations to business councils*
 - i. *Meeting date: 4/12/16*
 - ii. *Please see cover letters for proposals to the Northern Arapaho Tribe (Appendix C)*
 - b. *Tribal Historic Preservation Office (THPO) review for both tribes*
 - c. *IT Review for both tribes*
 - d. *Tribal Employment Rights Office (TERO) Review for both tribes*
 - e. *Bureau of Indian Affairs (BIA) consideration*
 - f. *SHPO review*
 - g. *Tribal legal review*
 - h. *Council review*
8. **Union Agent Stores**
- a. *Discussed - to be presented to business councils at a future date*

As Union Wireless has worked with EnerTribe and the afore mentioned tribal entities to further the above listed projects, we have worked to meet the FCC's tribal engagement requirements as follows:

II. Needs Assessment and Deployment Planning

Representatives of the Company met, and engaged in substantive discussions, with representatives of the Northern Arapaho Business Council on October 30, 2012. During this meeting the scope was identified to meet Tribal and FCC 901 Mobility Fund Phase I requirements. Those projects were worked to completion through the spring of 2016. On February 2, 2016, we held a communications workshop with key players involved in communications development for the Northern Arapaho. During this discussion, current and anticipated needs for wireless and fiber optic infrastructure was discussed leading to the proposal of two new projects included above (Arapaho Water Tank and Arapaho to Hudson Fiber). In addition to that several other tower locations were discussed for more long-term benefit. Those projects will be further developed at a later date. Please see Exhibit D for the agenda of this meeting.

Representatives of the Company met, and engaged in substantive discussions, with representatives of the Eastern Shoshone Business Council on January 15, 2013. During this meeting the scope was identified to meet Tribal and FCC 901 Mobility Fund Phase I requirements. Those projects were worked to completion through the spring of 2016. On February 4, 2016, we held a communications workshop with key players involved in communications development for the Eastern Shoshone. During this discussion, current and anticipated needs for wireless and fiber optic infrastructure was discussed leading to the

proposal of two new projects included above (Rocky Mountain Hall – Rooftop Wireless Site and Frank Wise to Shoshone Rose Fiber). Please see Exhibit E for the agenda of this meeting.

III. Feasibility / Sustainability Planning

The majority of the deployments for the FCC901 Mobility Fund were planned near existing developments to: 1) Serve locations inhabited by permanent residents, 2) Reduce impact to tribal and private assets due to deployment of network infrastructure, 3) Reduce installation and operational costs for each facility.

One facility within the scope of the SAC 518005 Mobility Fund Phase I project is planned to be deployed on privately deeded property in an undeveloped location with minimal access to grid power. Solar and wind power are planned to power this site to avoid extensive power lines across pristine tribal wilderness and to minimize impact to any culturally significant sites. The off-grid power sources also help to site the tower location to help provide services to a large area without extensive infrastructure deployment creating long-term sustainable services to the more remote areas of this census tract.

In further discussions with the tribes we have also been working to strategically partner on mutually beneficial projects to maximize capital available for these builds. In this way, we are maximizing the opportunities to serve this area now and in the future.

IV. Marketing Services in a Culturally Sensitive Manner

In recent meetings, (May 2016), at the Eastern Shoshone and Northern Arapaho Tribal Employment Rights Office, Marketing, Training and Engineering representatives met with James Sorrels, Compliance Officer and Willie Ferris, Shoshone Tribal Historic Preservation Officer, (THPO), for a cultural sensitivity session.

This meeting helped to develop guidelines for enhanced group interaction, as well as laying the framework for open communication and support for the unique perspectives, values and belief systems of the Arapahoe and Shoshone tribes. Union Wireless is committed to active, on-going support and business development with the tribal nations.

Our next steps are attending the Cultural Synergy conference scheduled for this summer, then follow-up meetings and work sessions to discuss the creation and framework of necessary processes to facilitate campaigns and community engagement support. These sessions will establish a marketing strategy for communication with potential customers, buy-in from strategic leaders of the tribes, as well as determining what agreed upon events we will support and at what level. Additionally, we are at the exploratory level of opportunities within the business development arena with the Arapaho and Shoshone tribes. Should these prove out, lengthy additional training, business planning, reporting sessions will be required.

V. Processes for: a) Right-Of-Way, b) Land Use Permits, c) Facilities Siting, d) Environmental Reviews

The Joint Tribal is currently recognized by only the Eastern Shoshone and the BIA. At this time, correspondence has been held with business councils from each tribe and approval must be obtained from

each tribe's council: Eastern Shoshone Business Council and Northern Arapaho Business Council respectively.

Union Wireless has currently received approvals on FCC 901 Mobility Fund Projects, and we are working with the tribes on further projects determined to be of mutual benefit to Union Wireless and the Tribes. Please see below for more detail on these processes.

a. Right of Way Processes

For all development within tribal service areas, public record research at the county and tribal level has been conducted to determine access requirements to the facility. For leases and easements on deeded lands (fee-simple lands), including those commencing from Federal, State or county public access roads, the Company negotiates with the landowner(s) of the property with oversight from the BIA. For leases and easements across tribal-owned lands, including those commencing from Federal, State or county public access roads, negotiations take place directly with each Tribal Business Council and require agreements from both to move forward. All leases and easements are required to have tribally-approved surveys and appraisals to verify fair market value and be recorded with the Bureau of Indian Affairs. We have currently entered into short-term license agreements with each tribe to allow time to fully work through the BIA process.

b. Land Use Permitting Requirements

For required land-use permits, approval is sought from both Tribal Business Councils as well as Bureau of Indian Affairs in addition to Fremont County and the State of Wyoming when necessary.

c. Facilities Siting Rules

Site location is determined to provide the best coverage area based on the geography of the location as well as from population/area served while not infringing upon known sacred regions. In addition, landownership requirements, power location and access to the site is weighted for time frame construction feasibility. Tribal approval of site location is sought from each Tribal Business Council.

d. Environmental Reviews

Each site, without regard to ownership or jurisdictional requirements, are mandated for environmental review per (47 CFR § 1.1307). Input from Federal, State, Tribal, and Local entities are sought for review as well as public notice and hearings prior to site construction. If required mitigation measures will be implemented.

VI. Cultural Preservation Reviews

Prior to site development, cultural studies are implemented from Federal/State agencies or from contracted approved cultural service firms. National Programmatic Agreement (36 CFR § 800.16(b)) guidelines are followed for the cultural review process. From these studies determination of any impact to any cultural, archeological or historical are addressed. The State Historic Preservation Office (SHPO) and Tribal Historic Preservation Office (THPO) review site locations and cultural studies. If no significant cultural impact is found, then concurrence with the study is given. If SHPO or THPO determine impact exists, then consultation is addressed at the site location for final determination. Once final concurrence is received site development proceeds.

Of the sites proposed within the bounds of the Wind River Indian Reservation, the facility in Crowheart, Wyoming required new NPA review. Concurrence letters were received from the Shoshone THPO and Arapaho THPO. The Ethete facility was built without ground penetration and as such will require full NPA review prior to 2018. We have, however, received concurrence letters from the Shoshone THPO and Arapaho THPO approving the project. The Winkleman facility was built prior to NPA implementation and as such was grandfathered for review. Our additions to the tower did not trigger additional review.

Thru the TCNS process tribal review includes the Apache Tribe of Oklahoma, Cheyenne-Arapaho tribes of Oklahoma, Comanche Nation, Eastern Shoshone Tribe, Fort Peck Tribes, Keweenaw Bay Indian Community, Lower Brule Sioux Tribe, Northern Arapaho Tribe, Northern Cheyenne Tribe, Shoshone-Bannock Tribes, Southern Ute Tribe, Upper Sioux Community of Minnesota and the Ute Indian Tribe.

VII. Compliance with Tribal Business and Licensing Requirements

The Tribal Employment Rights Office (TERO) represents both tribes and oversees the majority of Tribal Business and Licensing Requirements on the Reservation. We currently hold a business license (2016-00718) with the Shoshone and Arapaho Tribes and have obtained temporary work permits for the construction of the Ethete and Winkleman projects. We also have a temporary work permit for the drive testing of the FCC 901 Mobility Fund build out of SAC 518005. In addition to the work permit, we have sought and gained a 50% tribal hire for the completion of this portion of the project. We have also worked with the Shoshone and Arapaho Tribes Fish and Game Department to obtain a trespass authorization letter to allow us access to tribal lands for the purpose of drive testing our network. The TERO department has been extremely helpful most recently holding a Cultural Awareness training for the Union employees in preparation for the drive test and future projects. Union is up-to-date on all business licenses require by both tribes and is working out a long-term plan with Union for training and hires.

VIII. Points of Contact

Northern Arapaho

Each project listed above requires regular communication between Union and various department heads. We work cooperatively with Executive Secretary Susan Johnston when working with the NABC. The NABC assigned us a project lead by working with NATI/WRI's Patrick-Adam Lawson. Patrick-Adam Lawson has been responsible for the general direction of each project by ensuring the interests of the tribe are being met both from a technical and logistical standpoint. Additionally, we have worked with Yufna Soldier-Wolf in the THPO department to ensure all culturally related issues are being address for each project. On legal matters (agreements etc.) we work directly with the tribe's legal council Baldwin, Crocker & Rudd.

Eastern Shoshone

Each project listed above requires regular communication between Union and various department heads. Regular contact with the Executive Secretary Phoebe Wilson has proven beneficial when submitting proposals, requesting meetings with the ESBC and to assist with tribal review. Working cooperatively with Wilfred Ferris (THPO) has helped address any cultural concerns the tribe might have. The Tribal IT

Director John Brown was assigned as a project lead to ensure the tribe's interests are being met. Tribal council member Clint Wagon has assisted John Brown in this effort to ensure appropriate attention is being given to the future plans of the ESBC. On all legal matters we work directly with the tribe's legal counsel Nathan Maxon.

Joint Business Council

The JBC is operating with ESBC representation only however is still being used to address certain joint issues or projects on joint land. We initially worked with Earlene Three-Irons however Carolyn Shoyo replaced her. In an effort to remain neutral and to cover all our bases we initially met with the JBC as well however since then have been able to successfully address these issues with the ESBC directly.

BIA

We have met with Marietta Shortbull (Realty Officer), Becky Sage (Leases) and Leticia Black (ROW). Considering BIA is the "Trustee" for the land on the Reservation they encouraged Union to work directly with them throughout each project. The BIA is working with Union on all lease, license and right-of-way requirements for each project.

Wind River Internet Company (WRI)

WRI is a subsidiary of Northern Arapaho Tribal Industries (NATI) and has plans to build out Fiber on the reservation to help provide services to the 1,000+ subscribers it currently has.

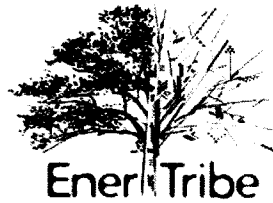
TERO

The Tribal Employment Rights office represents both tribes. The TERO department has been extremely helpful most recently holding a Cultural Awareness training for the Union employees in preparation for the drive test project. Stanford St. Claire and his team in the TERO department have made sure Union is in compliance to work on the reservation and hire local tribal members for projects where possible. Union has been working regularly with the TERO department on local hires for the drive tests offering training and work experience to qualified tribal members. Union is up-to-date on all business licenses require by both tribes and is working out a long-term plan with Union for training and hires.

IX. Summary

Our mission at Union Wireless is to continue facilitating economic growth in Indian County by working cooperatively with the Northern Arapaho and Eastern Shoshone tribes. The projects on the reservation are just a beginning of a long-term partnership between Union and the tribes.

APPENDIX A



September 14, 2015

Dv'laa Haa.

Ladies and Gentleman of the Eastern Shoshone Tribal Business Council,

Per our recent conversations, Union Wireless would like to expand our 3G services and overall wireless coverage to the tribal regions of the Wind River Indian Reservation. We have three projects that are approaching constructible milestones that we would like to bring forward for Tribal Business Council review:

I. Crowheart Fire Station – New Tower Build

a. Summary of Site Status

- i. Proposed site build – Union Wireless is proposing to build a new 120' tri-legged self-supporting tower with ancillary electronics and generator shelters.
 1. Site plans and Photos of the location provided on pages 3-5.
 2. Survey provided on page 6.
- ii. Leasing – Site is leased with Fremont County Fire District
 1. Redacted lease provided on pages 7-18.
- iii. Cultural Review – Currently working with Mr. Wilfred Ferris III of the Eastern Shoshone THPO and Ms. Yufna Soldier Wolf of the Northern Arapaho THPO to complete cultural studies and the necessary tasks to be in compliance with Section 106 of the National Historic Preservation Act.

b. Union Wireless is requesting Eastern Shoshone Tribal Business Council resolution to proceed.

II. Winkleman – Collocation on existing WYDOT tower

a. Summary of Site Status

- i. Collocation on Existing 150' Self-Support Tower – Union Wireless is proposing to place new equipment on an existing tower owned by WYDOT in addition to an electronics and generator shelter.
 1. Site Plans and Photos of the location provided on pages 19-21.
- ii. Review of technical feasibility complete with WYDOT. Their final approval is contingent upon Tribal Business Council approval of the project per the tribal license issued for the tower site.
 1. Letter of preliminary approval and project application as submitted to WYDOT is provided on pages 22-24.

b. Union Wireless is requesting Eastern Shoshone Tribal Business Council resolution to proceed.

III. Ethete – Collocation on existing Verizon Wireless/American Tower Company tower

a. Summary of Site Status

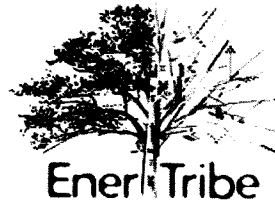
- i. Collocation on Existing 180' Self-Support Tower – Union Wireless is proposing to place new equipment on an existing tower owned by Verizon Wireless/American Tower Company in addition to an electronics and generator shelter.
 1. Site Plans and Photos of the location provided on pages 25-27.
- ii. Review of technical feasibility complete with Verizon Wireless. Their final approval is contingent upon Tribal Business Council approval of the project per the tribal license issued for the tower site.
 1. Letter of preliminary approval and project application as submitted to Verizon Wireless provided on pages 28-35.
 2. Eastern Shoshone and Northern Arapaho Tribes License for existing tower provided on pages 36-42.

b. Union Wireless is requesting Eastern Shoshone Tribal Business Council resolution to proceed.

We thank you for your time and please don't hesitate to let us know of any other considerations that might be held by the Eastern Shoshone Tribe on these projects.

Sincerely,

***David L. Hinds, Site Acquisition Specialist
Union Telephone Company
300 East 15th Street
Cheyenne, Wyoming 82001
(307) 782-4294
dhinds@unionwireless.com***



September 21, 2015

Dv'laa Haa.

Ladies and Gentleman of the Northern Arapaho Tribal Business Council,

Union Wireless would like to expand our 3G services and overall wireless coverage to the tribal regions of the Wind River Indian Reservation. We have three projects that are approaching constructible milestones that we would like to bring forward for Tribal Business Council review:

I. Crowheart Fire Station – New Tower Build

a. Summary of Site Status

- i. Proposed site build – Union Wireless is proposing to build a new 120' tri-legged self-supporting tower with ancillary electronics and generator shelters.
 1. Site plans and Photos of the location provided on pages 3-5.
 2. Survey provided on page 6.
- ii. Leasing – Site is leased with Fremont County Fire District
 1. Redacted lease provided on pages 7-18.
- iii. Cultural Review – Currently working with Mr. Wilfred Ferris III of the Eastern Shoshone THPO and Ms. Yufna Soldier Wolf of the Northern Arapaho THPO to complete cultural studies and the necessary tasks to be in compliance with Section 106 of the National Historic Preservation Act.

b. Union Wireless is requesting Northern Arapaho Tribal Business Council resolution to proceed.

II. Winkleman – Collocation on existing WYDOT tower

a. Summary of Site Status

- i. Collocation on Existing 150' Self-Support Tower – Union Wireless is proposing to place new equipment on an existing tower owned by WYDOT in addition to an electronics and generator shelter.
 1. Site Plans and Photos of the location provided on pages 19-21.
- ii. Review of technical feasibility complete with WYDOT. Their final approval is contingent upon Tribal Business Council approval of the project per the tribal license issued for the tower site.
 1. Letter of preliminary approval and project application as submitted to WYDOT is provided on pages 22-24.

b. Union Wireless is requesting Northern Arapaho Tribal Business Council resolution to proceed.

III. Ethete – Collocation on existing Verizon Wireless/American Tower Company tower

a. Summary of Site Status

- i. Collocation on Existing 180' Self-Support Tower – Union Wireless is proposing to place new equipment on an existing tower owned by Verizon Wireless/American Tower Company in addition to an electronics and generator shelter.
 1. Site Plans and Photos of the location provided on pages 25-27.
- ii. Review of technical feasibility complete with Verizon Wireless. Their final approval is contingent upon Tribal Business Council approval of the project per the tribal license issued for the tower site.
 1. Letter of preliminary approval and project application as submitted to Verizon Wireless provided on pages 28-35.
 2. Northern Arapaho and Eastern Shoshone Tribes License for existing tower provided on pages 36-42.

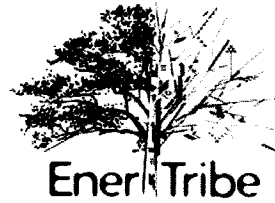
b. Union Wireless is requesting Northern Arapaho Tribal Business Council resolution to proceed.

We thank you for your time and please don't hesitate to let us know of any other considerations that might be held by the Northern Arapaho Tribe on these projects.

Sincerely,

***David L. Hinds, Site Acquisition Specialist
Union Telephone Company
300 East 15th Street
Cheyenne, Wyoming 82001
(307) 782-4294
dhinds@unionwireless.com***

APPENDIX B



March 31, 2016

Dv'laa Haa.

Ladies and Gentleman of the Eastern Shoshone Tribal Business Council,

Union Wireless and EnerTribe would like to express our appreciation for the collaborative brainstorming that occurred at the Eastern Shoshone/Union Wireless Communications Workshop in February 2016. In order to help facilitate solutions to the communications needs identified for both tribal members and tribal government, we would like to follow up with more detail on the projects that were discussed in that workshop. We currently have three projects identified that we would like additional Tribal Business Council review at this time:

I. Rocky Mountain Hall – Collocation on Existing Building

a. Summary of Project Status

- i. Proposed site build –The goal of the project is to provide excellent in-building wireless voice and data services in the Town of Fort Washakie. We are proposing to place 4 antennas (3 panels and 1 microwave) with radio gear wall mounted on the exterior of the building. Cabling from the antennas would travel back to an outdoor cabinet mounted on a grated platform located on the south side of the building.
 1. Proposed site plans provided on page 3.
- ii. Leasing – Tribal lease/license needed.
 1. Drafted license agreement provided on page 6.

b. Union Wireless is requesting Eastern Shoshone Tribal Business Council resolution to proceed.

II. Fiber Project – Frank Wise Building to Shoshone Rose Casino

a. Summary of Project Status

- i. Initial Proposed route identified – The goal of the project is to increase connectivity capabilities between Fort Washakie, the Frank Wise Building, and the Shoshone Rose Casino
 1. Route Summary on page 12.
 2. More detailed topographical maps on pages 13-16.
- ii. Basic terms
 1. Union Wireless to provide construction labor and materials (estimated \$521,147 value)
 2. Union Wireless to provide maintenance with additional maintenance fees charged to non-tribal collocators.
 3. Eastern Shoshone Tribe to own the conduit and fiber,

4. Union Wireless provided access to 4 strands of dark fiber

b. Union Wireless is requesting Eastern Shoshone Tribal Business Council resolution to proceed and a point of contact representing tribal interests for this project.

III. Winkelman Tower Ownership Transfer

a. Summary of Status

- i. Amendment to previous settlement agreement drafted to relinquish ownership of the tower properties to the tribes rather than requiring reclamation of the tower site.
- ii. Please see page 17.

b. Union Wireless is requesting Eastern Shoshone Tribal Business Council resolution to proceed.

Lastly, as an update, we discussed the opportunity to establish the Eastern Shoshone an Union Wireless agent in order to make the results of these projects more broadly accessible to the tribal members. We are currently working on improving our process for setting up and working with agent stores. We will bring more information on that endeavor to the council in the near future.

We thank you for your time and please don't hesitate to let us know of any other considerations that might be held by the Eastern Shoshone Tribe on these projects.

Sincerely,

***Alyssa R. Blair, Site Development Manager
Union Telephone Company
850 N. Highway 414
Mountain View, WY 82939
(307) 782-4078
ablair@unionwireless.com***